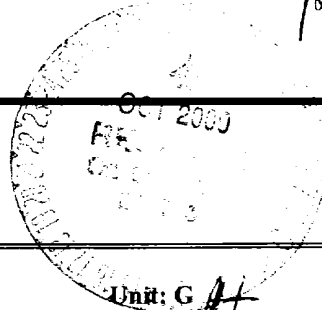


EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Neah Victoria 2
Meter/Line ID - 97282



SITE DETAILS

Legals - Twn: 27
NMOCD Hazard Ranking: 30
Operator: Texaco

Rng: 9

Sec: 1
Unit: G
Land Type: Eastern Navajo Agency
Pit Closure Date: 08/17/94

RATIONALE FOR CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A pit was excavated to five feet, where bedrock was encountered, and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 30 cubic yards of material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 128 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 98 mg/kg, and a TPH concentration of 720 mg/kg. This site was re-assessed on August 28, 2000 because the initial assessment incorrectly identified washes as a surface water body.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.
- Groundwater was not encountered in the excavation.
- Bedrock was encountered in the pit at five feet below ground surface, making vertical contaminant migration unlikely and further remediation impractical.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.
- The pit was excavated to the practical extent of the equipment, according to EPNG's pit closure plan.

ATTACHMENT

Field Pit Assessment Form
Field Pit Remediation/Closure Form
Laboratory Analytical Results
Revised Field Pit Assessment Form

REVISED
FIELD PIT SITE ASSESSMENT FORM

Meter: 97282 Location: NEAR VICTORIA 2
Operator #: 0263 Operator Name: TEXACO P/L District: BAUARD
Coordinates: Letter: E Section 1 Township: 27 Range: 9
Or Latitude _____ Longitude _____
Pit Type: Dehydrator X Location Drip: _____ Line Drip: _____ Other: _____
Site Assessment Date: 8/29/00 Area: 11 Run: 71

NMOCD Zone:

(From NMOCD
Maps)

Inside

Outside

Land Type:

☒ (1)

☐ (2)

BLM ☐ (1)

State ☐ (2)

Fee ☐ (3)

Indian EASTERN
NAVAJO AGENCY

Depth to Groundwater

Less Than 50 Feet (20 points)

☐ (1)

50 Ft to 99 Ft (10 points)

☒ (2)

Greater Than 100 Ft (0 points)

☐ (3)

Wellhead Protection Area

Is it less than 1000 ft from wells, springs or other sources of fresh water extraction?, or; Is it less than 200 ft from a private domestic water source?

☒ (1) YES (20 points)

☐ (2) NO (0 points)

Horizontal Distance to Surface Water Body

Less Than 200 Ft (20 points)

☐ (1)

200 Ft to 1000 Ft (10 points)

☐ (2)

Greater Than 1000 Ft (0 points)

☒ (3)

Name of Surface Water Body _____

(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream

☐ (1) < 100' (Navajo Pits Only)

☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 30 **POINTS**

Remarks : Site has been re-assessed, due to initial assessment including washes as a Surface Water Body.

FIELD PIT SITE ASSESSMENT FORM

10

GENERAL

Meter: 97282 Location: Near Victoria 2
 Operator #: 0263 Operator Name: Texaco P/L District: Ballard
 Coordinates: Letter: G Section: 1 Township: 27 Range: 9
 Or Latitude _____ Longitude _____
 Pit Type: Dehydrator ☒ Location Drip: _____ Line Drip: _____ Other: _____
 Site Assessment Date: 6-14-94 Area: 11 Run: 71

NMOCD Zone:

(From NMOCD
Maps)

Inside
Outside

Land Type:

BLM ☐ (1)
 State ☐ (2)
 Fee ☐ (3)

☒ Indian Eastern Navajo
Agency

Depth to Groundwater

Less Than 50 Feet (20 points) ☐ (1)
 50 Ft to 99 Ft (10 points) ☒ (2)
 Greater Than 100 Ft (0 points) ☐ (3)

Wellhead Protection Area :

Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction? , or ; Is it less than 200 ft from a private domestic water source? ☒ (1) YES (20 points) ☒ (2) NO (0 points)
 K6W 6-14-94

Horizontal Distance to Surface Water Body

Less Than 200 Ft (20 points) ☐ (1)
 200 Ft to 1000 Ft (10 points) ☒ (2)
 Greater Than 1000 Ft (0 points) ☐ (3)

Name of Surface Water Body Blanco Wash

(Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds)

Distance to Nearest Ephemeral Stream ☒ (1) < 100' (Navajo Pits Only)
☐ (2) > 100'

TOTAL HAZARD RANKING SCORE: 40 POINTS

Remarks : one pit dry. Measured from dogleg

REMARKS

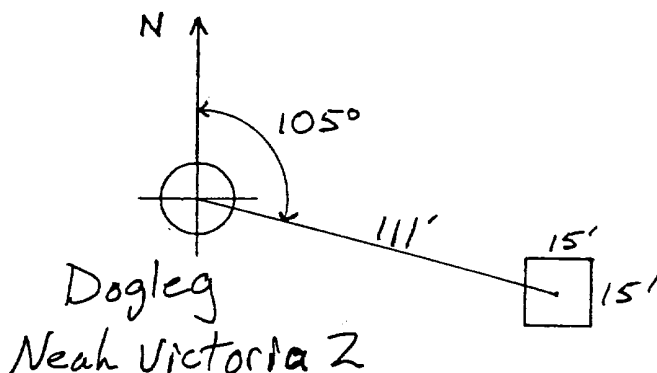
Dr. G. H. H. H.

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 105 Footage from Wellhead 111
b) Length : 15 Width : 15 Depth : 4

Dogleg - Near Victoria 2



REMARKS

Remarks :

Photos - 1449

Dogleg across Blanco Wash Road from
meter house

Completed By:

[Signature]

Signature

6-14-94

Date

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	<p>Meter: <u>97282</u> Location: <u>NEAR VICTORIA #2</u></p> <p>Coordinates: Letter: <u>G</u> Section <u>1</u> Township: <u>27</u> Range: <u>9</u></p> <p>Or Latitude _____ Longitude _____</p> <p>Date Started : <u>8-17-94</u> Run: <u>11</u> <u>71</u></p>
FIELD OBSERVATIONS	<p>Sample Number(s): <u>KP190</u></p> <p>Sample Depth: <u>5'</u> Feet</p> <p>Final PID Reading <u>128</u> PID Reading Depth <u>5</u> Feet</p> <p>Yes No</p> <p>Groundwater Encountered <input type="checkbox"/> <input checked="" type="checkbox"/> Approximate Depth _____ Feet</p>
CLOSURE	<p>Remediation Method :</p> <p>Excavation <input checked="" type="checkbox"/> Approx. Cubic Yards <u>30</u></p> <p>Onsite Bioremediation <input type="checkbox"/></p> <p>Backfill Pit Without Excavation <input type="checkbox"/></p> <p>Soil Disposition:</p> <p>Envirotech <input checked="" type="checkbox"/> Tierra <input type="checkbox"/></p> <p>Other Facility <input type="checkbox"/> Name: _____</p> <p>Pit Closure Date: <u>8-17-94</u> Pit Closed By: <u>BEI</u></p>
REMARKS	<p>Remarks : <u>Some lime markers on location. Started</u></p> <p><u>Remediating to 12 Hit sand stone 5' soil light gray</u></p> <p><u>Pid 128 closed pit.</u></p> <p>Signature of Specialist: <u>Kelly Padilla</u></p>



Page _____ of _____

[illegible]



FIELD SERVICES LABORATORY
ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 190	945953
MTR CODE SITE NAME:	97282	N/A
SAMPLE DATE TIME (Hrs):	8/17/94	1035
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	8/18/94	8/18/94
DATE OF BTEX EXT. ANAL.:	8/22/94	8/22/94
TYPE DESCRIPTION:	KS VC	Grey Fine Sand

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	20.5	MG/KG	20			
TOLUENE	31	MG/KG	20			
ETHYL BENZENE	3.9	MG/KG	20			
TOTAL XYLENES	63	MG/KG	20			
TOTAL BTEX	101.98	MG/KG				
TPH (418.1)	720	MG/KG			1.95	28
HEADSPACE PID	128	PPM				
PERCENT SOLIDS	99.9	92.2 %				

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 106 % for this sample All QA/QC was acceptable.

Narrative:

ATI results attached.

DF = Dilution Factor Used

Approved By:

Date:

7/2/94

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : El PASO NATURAL GAS CO. ATI I.D.: 408380
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
07	945953	NON-AQ	08/17/94	08/22/94	08/22/94	20
08	945954	NON-AQ	08/17/94	08/22/94	08/23/94	10
09	945955	NON-AQ	08/17/94	08/22/94	08/23/94	10
PARAMETER			UNITS	07	08	09
BENZENE			MG/KG	<0.5	<0.25	<0.25
TOLUENE			MG/KG	31	4.0	4.1
ETHYLBENZENE			MG/KG	3.9	0.42	0.54
TOTAL XYLENES			MG/KG	63	6.7	18

SURROGATE:

BROMOFLUOROBENZENE (%) 106 85 149*

*OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE



2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. 408380

August 24, 1994

El Paso Natural Gas Company
P.O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 08/19/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

H. M. Tull Subt

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

